

I am pleased to submit the following comments regarding the Final Environmental Impact Statement for the Village at Wolf Creek Access Project, issued in November 2014. I would like to thank the Forest Service for the opportunity to do so, and for effort and expense that has gone into the FEIS. I am commenting on this action as a citizen of the state of Colorado, I grew up visiting this pristine area and I believe it has tremendous intrinsic value. As a biologist, student of ecology and conservation I feel that I possess an understanding of the breadth of these issues and am qualified to speak to them.

On November 20, 2014 the United States Forest Service, despite widespread resistance, made public its intended approval of a land exchange that would allow the construction of a resort metropolis of 8,000-10,000 people in the Rio Grande National Forest, near the top of Wolf Creek Pass. This exchange is, in essence, a green light for the construction of a city in an old-growth spruce forest, directly adjacent to an extremely fragile wetlands ecosystem, in the heart of endangered Canada lynx habitat. It is difficult for one to see the benefit of such a plan; the potential for disruption and destruction of the surrounding wilderness, wetlands, and wildlife is far too great to allow this exchange to be actualized. Any long-term benefit this project may have for the people of Colorado remains to be elucidated. Potential tourist dollars would merely pass through local communities on their way to this 'trophy resort' while its out of state proprietors profit our ecological disaster. For these reasons the Village at Wolf Creek Access Project should not be allowed.

The Forest Service states in the EIS that the need for action is "to allow the non-Federal party to access its property as legally entitled, while minimizing environmental effects to natural resources within the project area." Access to the private property, however, is already provided via Forest Road 391 (SLVEC 2012). While this access may not be sufficient for the development of a mega-resort it is sufficient for "reasonable use and enjoyment" as stated in the Need for Action (FEIS). If the Forest Service is truly committed to "minimizing the environmental effects to natural resources" its only acceptable recourse is to approve the No Action alternative as it provides the greatest conservation opportunity. It is in the best interest of the people of the United States to conserve our natural resources and to preserve, for posterity, our few remaining wild places.

The San Juan Mountains are a habitat of critical importance to the Canada lynx (*Lynx canadensis*), a species listed as Threatened under the Endangered Species Act. The Forest Service itself has designated the Wolf Creek Pass area as an important lynx linkage because of its significance for north-south movements by lynx and other wildlife (SREP 2006). The linkage itself serves not only as a wildlife corridor but facilitates daily and seasonal inter-territory movements, allows for mating and genetic exchange, and is vital for movement and colonization of vacant habitat (FEIS). Relating specifically to the lynx the FEIS states: "Because of the patchy, discontinuous distribution of lynx habitat in the Southern Rockies Ecosystem, maintaining landscape-level habitat connectivity may be paramount to maintaining a viable population. Landscape linkages must be available to allow lynx movements between adjacent mountain ranges." The proposed land exchange between the United States and Leavell-McCombs Joint Venture (LMJV) could be

catastrophic for the lynx population in the southern Rockies; it is a risky proposition at best.

At its current level of use, traffic and maintenance of U.S. 160 through the Wolf Creek Pass lynx linkage already adversely affects the lynx because of habitat fragmentation and the probability of road kill (FEIS). Lynx tracking data has shown the animals to move back and forth across the highway multiple times. Though animal vehicle collision rates are currently low the volume of traffic in the area is low as well (SREP 2006). The Development planned by the LMJV, however, would result in a greatly increased volume of traffic over the pass and require the construction of turning lanes in and out of the resort, at minimum. This would further deter animals from utilizing this habitat linkage thereby reducing its functionality, any animals continuing to use this passage would face an increased risk of death or injury. It is also important to point out that this habitat linkage though named for the lynx is also utilized by numerous other species including: pine marten (*Martes americana*), mountain lion (*Puma concolor*), black bear (*Ursus americanus*) elk (*Cervus elaphus*), and mule deer (*Odocoileus hemionus*), all of which would be adversely affected by the proposed development.

One of the potential public benefits alluded to in the FEIS is the transfer of ownership from LMJV to the Forest Service acreage including wetlands and a perennial stream. While the protection of wetlands is a conservation priority it is extremely unlikely that LMJV would have been able to secure the permits necessary to begin development on a fen wetland, which are an exceedingly rare and fragile type of ecosystem and subject to numerous state and Federal regulations (SLVEC). Further, the land currently held by LMJV is protected by a scenic easement, which would have further hindered any development efforts (SLVEC). In exchange for these lands LMJV expects to gain a larger area, free of easements, open for development and with direct highway access. It is of little surprise questions have been raised as to the relative values of the lands proposed for exchange. As it currently stands the land held by LMJV is unsuitable for development into an 8,000-person resort community. It is also worthwhile to point out that the U.S. Forest service is under no obligation to facilitate the development of any privately held enterprise.

It is of little doubt that this land exchange is not in the public interest and as an agency that manages natural resources belonging to the public; the Forest Service is obligated to make decisions that best serve the public interest (SLVEC). In order to protect the character and ecology of the Wolf Creek Pass area, I implore the Forest Service to conclude what I think is already abundantly clear: the only action that aligns completely with the public interest is the No Action alternative.

Thank you for your time and consideration of these comments; I look forward to your response.

Sincerely,

Vinson Turco

Works Cited

"Draft Decision Released for Village at Wolf Creek Access Project." *Rio Grande National Forest - News & Events*. USDA, 20 Nov. 2014. Web. 08 Dec. 2014.
<<http://www.fs.usda.gov/detail/riogrande/news-events/?cid=STELPRD3823301>>.

"Final Environmental Impact Statement Village at Wolf Creek Access Project."
Epa.gov. USDA Forest Service Rocky Mountain Region Rio Grande National Forest
Divide Ranger District, 20 Nov. 2014. Web. 08 Dec. 2014.
<[http%3A%2F%2Fyosemite.epa.gov%2Ffoeca%2Fweb/eis.nsf%2F\(EISDocs\)%2F20140335%2F%24file%2FFEIS%2520VWC%2520Access%2520Project_FEIS_Vol_1.pdf%3FOpenElement](http://3a%2F%2Fyosemite.epa.gov%2Ffoeca%2Fweb/eis.nsf%2F(EISDocs)%2F20140335%2F%24file%2FFEIS%2520VWC%2520Access%2520Project_FEIS_Vol_1.pdf%3FOpenElement)>.

Kintsch, Julia. *Linking Colorado's Landscapes Phase II Report*. Rep. Rocky Mountain Wild, Apr. 2006. Web. 08 Dec. 2014. <http://rockymountainwild.org/_site/wp-content/uploads/US%20160%20Wolf%20Creek%20Pass.pdf>.

Pierce, Randi. "A Village and a Lynx." *The Pagosa Springs Sun*. The Pagosa Springs Sun, 20 Nov. 2014. Web. 12 Dec. 2014. <<http://www.pagosasun.com/a-village-and-a-lynx/>>.

Pollock, Josh. "Village At Wolf Creek Access Project DEIS Comments." Letter to Tom Malecek, Divide District Ranger. 11 Oct. 2012. *San Luis Valley Ecosystem Council*. San

Luis Valley Ecosystem Council, 11 Oct. 2012. Web. 08 Dec. 2014.
<http://www.slvec.org/images/docs/10.16.12._deis_comments_rmwild_et_al_1.pdf
>.

"Southern Rockies Wolf Creek Ecosystem (CO)." *Home*. Western Environmental Law Center, 17 Aug. 2012. Web. 08 Dec. 2014. <<http://www.westernlaw.org/our-work/wildlife/canada-lynx/southern-rockies-wolf-creek-ecosystem-co>>.

"Village at Wolf Creek." *San Luis Valley Ecosystem Council*. San Luis Valley Ecosystem Council, n.d. Web. 12 Dec. 2014. <<http://www.slvec.org/wolf-creek-pass-developments/village-at-wolf-creek>>.

